

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
ROBERT MAKOWSKI,

Plaintiff,

-against-

08 Civ. 6150 (PAC)

STIPULATION (2)

UNITED BROTHERHOOD OF CARPENTERS AND JOINERS OF AMERICA, DISTRICT COUNSEL OF NEW YORK CITY and VICINITY OF THE UNITED BROTHERHOOD OF CARPENTERS AND JOINERS OF AMERICA, LOCAL 157 OF DISTRICT COUNSEL OF NEW YORK CITY and VICINITY OF THE UNITED BROTHERHOOD OF CARPENTERS AND JOINERS OF AMERICA, LOCAL 608 OF DISTRICT COUNSEL OF NEW YORK CITY and VICINITY OF THE UNITED BROTHERHOOD OF CARPENTERS AND JOINERS OF AMERICA, LOCAL 608 NORTH OF DISTRICT COUNSEL OF NEW YORK CITY and VICINITY OF THE UNITED BROTHERHOOD OF CARPENTERS and JOINERS OF AMERICA, LOCAL 45 OF DISTRICT COUNSEL OF NEW YORK CITY and VICINITY OF THE UNITED BROTHERHOOD OF CARPENTERS AND JOINERS OF AMERICA, DOUGLASS J. MCCARRON, DENIS SHIEL, FRED KENNEDY, BILL HANLEY, MARTIN DEVEREAUX, GEORGE DILACIO, VIN TADDEO, SAL ANTONUCCI, NATIONAL ENVIRONMENTAL SAFETY COMPANY, INC., FELIX "DOE," JR. FELIX "DOE" SR., TOM "DOE", NOEL "DOE," "JOHN DOE 1-8," "JOHN DOE INC. 9-15", AND METROPOLITAN ARCHITECTURAL WOODWORK, LLC.

Defendants.  
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IT IS HEREBY STIPULATED AND AGREED, by and between counsel for parties hereto that the time of defendants DISTRICT COUNCIL OF NEW YORK CITY AND VICINITY OF THE UNITED BROTHERHOOD OF CARPENTERS AND JOINERS OF AMERICA, LOCAL 157 OF THE DISTRICT COUNCIL OF NEW YORK CITY AND VICINITY OF THE UNITED BROTHERHOOD OF CARPENTERS AND JOINERS OF


AMERICA, LOCAL 608 OF THE DISTRICT COUNCIL OF NEW YORK CITY AND  
VICINITY OF THE UNITED BROTHERHOOD OF CARPENTERS AND JOINERS OF  
AMERICA, LOCAL 608 NORTH OF DISTRICT COUNCIL OF NEW YORK CITY AND  
VICINITY OF THE UNITED BROTHERHOOD OF CARPENTERS AND JOINERS OF  
AMERICA, LOCAL 45 OF THE DISTRICT COUNCIL OF NEW YORK CITY AND  
VICINITY OF THE UNITED BROTHERHOOD OF CARPENTERS AND JOINERS OF  
AMERICA, DENIS SHEEL, MARTIN DEVEREAUX, VIN TADDEO and SAL ANTONUCCI  
to answer or move with respect to the complaint is extended to and including August 29, 2008.

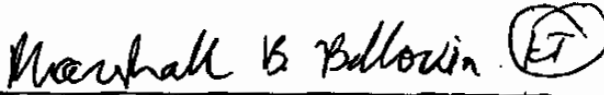
IT IS FURTHER STIPULATED AND AGREED, that the foregoing defendants waive  
defenses relating to service of process and personal jurisdiction.

Dated: New York, New York  
July 31, 2008

O'DWYER & BERNSTIEN, LLP  
*Attorneys for Defendants District  
Council, Local 607, Local 608,  
Local 608N, Local 45, Sheel,  
Devereaux, Taddeo and Antonucci*

BALLON STOLL BADER & NADLER, P.C.  
*Attorneys for Plaintiff*

  
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SO ORDERED: AUG 05 2008

  
U.S.D.J.

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August 4, 2008

PAUL O'DWYER (1907-1998)  
OSCAR BERNSTIEN (1885-1974)  
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OF COUNSEL:  
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ANNE M. PAXTON  
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CRAIG R. NUSSBAUM \*\*

\* ALSO ADMITTED IN NJ  
\*\* ALSO ADMITTED IN CT  
^ ALSO ADMITTED IN PA & NJ  
"J.D. NOT ADMITTED

WRITER'S DIRECT DIAL

By Hand

Honorable Paul A. Crotty  
United States District Judge  
United States District Court  
500 Pearl Street  
New York, New York 10007

Re: Makowski v. United Brotherhood of Carpenters, et al.  
08 Civ. 6150 (PAC)

Dear Hon. Crotty:

This firm represents defendants District Council of Carpenters, Local 157, Local 608, Local 608 N, Local 45, Denis Sheil, Martin Devereaux, Vin Taddeo and Sal Antonucci. We write with respect to an extension of time to respond to the complaint. Plaintiff's counsel, Marshall B. Bellovin, Esq. has consented to this extension.

The Defendants represented by this firm were served at different times, and thus their answers are due at various times. According to the Clerk's office (and as reflected on Pacer) the answers of defendants Antonucci and Local 45 are due August 4, 2008, the answer for defendant Local 608 N is due August 6, 2008, and the answers for defendants District Council, Local 157, Local 608, Denis Sheil, Martin Devereaux, Vin Taddeo and Sal Antonucci are due August 11, 2008.

Counsel have entered into a stipulation providing the time for the above defendants to answer or move is extended to and including August 29, 2008. This is the first request for extension of time.

We respectfully request that the Court "So Order" the enclosed Stipulation. Thank you for consideration of this request.

Respectfully yours,

O'DWYER & BERNSTIEN, LLP

  
GARY SILVERMAN (GS9287)

cc: Marshall B. Bellovin, Esq.  
enc.